

1 the traffic routing instructions resident in the switch that direct the entrant's local  
2 traffic to other end offices using the same trunk groups as Ameritech. Ameritech's  
3 proposal does not appear to contemplate such a common transport option as a  
4 network element.

5  
6 It is useful to note that Ameritech's transport regime would require that the local  
7 traffic of each ULS-based provider would need to be selectively routed to new trunk  
8 groups. As discussed below, however, Ameritech's ability to provided customized  
9 routing is limited by the software that today populates Ameritech's switches. It  
10 makes no sense to exhaust this resource prematurely by *requiring* carriers to  
11 establish special trunk groups for their local traffic when the use of preexisting  
12 routing tables may be the most efficient option. Because customized routing  
13 capability may be subject to capacity constraints in the near term, it is important that  
14 it be used wisely.

15  
16 **Q. Is customized routing critical to particular aspects of local competition?**

17  
18 **A.** Yes. The Act and federal rules both recognize that new providers should be able to  
19 competitively offer local operator and directory services without forcing customers

1 to learn new dialing patterns. Where a carrier offers local services using unbundled  
2 local switching from Ameritech, this means that the purchasing carrier must be able  
3 to "presubscribe" the local operator (0-) and directory (411) dialing patterns to  
4 operator and directory systems of its choice.<sup>12</sup> Ameritech indicates that it will work  
5 to make such a capability available, but it also indicates that new software may be  
6 necessary to satisfy this requirement. It is impossible from Mr. Dunny's testimony,  
7 however, to determine whether Ameritech can today comply with the Act's  
8 requirement to provide local dialing parity to carriers using unbundled local  
9 switching local dialing parity.<sup>13</sup>

---

<sup>12</sup> My emphasis on using customized routing to promote competitively provided operator and directory services should not be misinterpreted. Selective routing of *all* categories of local traffic is important. However, to the extent that customized routing capability is limited, it is particularly important that it not be wasted.

<sup>13</sup> Mr. Dunny's testimony appears to lay the foundation for an argument that such dialing parity is not technically feasible. However, the requirement to provide dialing parity is an unequivocal obligation under the Act (Section 251(b)(3)) and, as such, Ameritech must solicit and obtain the necessary software to comply with this requirement. I would expect that local switching software designed for a multi-vendor environment would also provide the capability to selectively route local traffic as well.

1     **Q.     Is this a complete inventory of the deficiencies in Ameritech's compliance with**  
2     **the Competitive Checklist prong of Section 271?**

3  
4     A.     No. The purpose of my testimony is not to provide a detailed listing of each  
5     deficiency in Ameritech's claim. I fully expect other parties to provide the  
6     Commission a detailed listing of each of these problems and will not duplicate that  
7     effort here. My overall conclusion, however, is that Ameritech effectively misses  
8     the intent (as well as the letter) of the Competitive Checklist. These requirements  
9     are collectively intended to create a robustly competitive local environment as the  
10    predicate to permitting Ameritech's participation as a full service provider of local  
11    and long distance services. Narrowly defining the Checklist in a manner which  
12    precludes competition may superficially accelerate Ameritech's compliance with the  
13    checklist prong of Section 271, but it would also assure that Ameritech cannot  
14    comply with the second prong of demonstrated competition.

1    **Q.    Can you provide an example where Ameritech narrowly construes its**  
2       **obligations?**

3  
4    **A.    Yes.  After nearly a year discussing the importance of network combinations to**  
5       **promote local competition, culminating in this Commission's precedential platform**  
6       **arrangement, Ameritech continues to resist implementing such a framework.**  
7       **Consider, for instance, the tension between the federal rules concerning network**  
8       **combinations and Ameritech's interpretation:**

9  
10       Rule 47 CFR § 51.315(b):            Except upon request, an incumbent LEC *shall*  
11   *not separate* requested network elements that  
12   the incumbent LEC currently combines.  
13

14       Ameritech's interpretation:        Unless requested otherwise, network  
15   elements are provided by Ameritech Illinois  
16   *unbundled from other elements* and facilities.  
17

18       Although Ameritech may argue that its commitment is sufficient to satisfy a narrow  
19       reading of federal rules, it certainly indicates an unwillingness to design operational  
20       systems to support network combinations as the standard offer.  This view appears  
21       confirmed by Mr. Dunny's testimony that "[n]ormally, new and revised re-bundling

1 arrangements are requested through the BFR Process."<sup>14</sup> Ameritech is apparently  
2 embarked on a program to standardize the exception (individual elements obtained  
3 separately) and handle as an exception the standard (network elements ordered in  
4 their preexisting combination).

5  
6 Ameritech's own experience with local competition (discussed below), however,  
7 demonstrates that element-based competition without the benefit of established  
8 combinations is a slow and complicated process. Its own testimony is that service  
9 intervals to implement an end-user's change in local provider using unbundled loops  
10 (without the benefit of a loop/switch combination) is *five days* -- far longer than the  
11 interval in which Ameritech will be able to shift customers to its local/long distance  
12 packages.<sup>15</sup> Although we cannot yet conclude that the platform configuration will  
13 reduce barriers to local entry to a level sufficient to permit Ameritech to offer  
14 interLATA service, the evidence shows that the actions taken to date are not.

---

<sup>14</sup> Direct Testimony of Gregory Dunny, Ameritech Illinois Exhibit 2.0, page 18.

<sup>15</sup> The service interval for changing a customer's long distance carrier is 24 hours.  
Source: Ameritech response to AT&T 138.

1    **Q.    Is it clear that Ameritech cannot demonstrate the presence of meaningful local**  
2       **competition (facilities-based or otherwise)?**

3  
4    **A.    Yes. Mr. Gebhardt's testimony illustrates the nascent state of local competition.**  
5       **Although the specific information is proprietary, the data supplied by Mr. Gebhardt**  
6       **supports the following conclusions:**

7  
8       \*     Unbundled loops comprise less than 0.1% of Ameritech Illinois'  
9       access lines.

10  
11      \*     Local traffic originated on CLEC networks (and terminated on  
12      Ameritech Illinois' network) is less than 0.2% of Ameritech's local  
13      minutes.

14  
15      \*     Ameritech has withdrawn its unbundled port offering because of no  
16      demand.

17  
18      \*     There are no physical collocations in Ameritech Illinois' territory.

19  
20      \*     The interface to Ameritech's repair and maintenance systems has not  
21      yet been accessed by even a single reseller.

22  
23      This evidence demonstrates that local competition is barely measurable, much less  
24      sufficient to conclude that the Competitive Presence test in Section 271 is satisfied

1           under *any* reasonable interpretation of the Act. As such, the Commission need not  
2           adopt any specific metric at this time to unambiguously report to the DOJ and FCC  
3           that Ameritech does not yet comply with the requirements of Section 271.

4  
5   **Q.     Please summarize your recommendations.**

6  
7   **A.**    The Commission should investigate Ameritech's claims to the point where they have  
8           concluded that Ameritech does not yet satisfy the requirements of Section 271. The  
9           Commission need not, however, compile an exhaustive inventory of *each* deficiency  
10          in Ameritech's compliance. To do so now would likely encourage Ameritech to  
11          address only those specific technical items as opposed to openly working to  
12          establish meaningful local competition.

13  
14          The Commission should continue this investigation to more closely examine the  
15          requirements of each element of the Checklist to assure that these tools are  
16          practically (not theoretically) available. This investigation can continue on a parallel  
17          track to the Commission's investigation of the pricing and specific components of  
18          Ameritech's tariff and statement.

19

1    **Q.    Does this conclude your direct testimony?**

2

3    **A.    Yes.**



# HOGAN & HARTSON

L.L.P.

NOV 22 9 41 AM '96

November 21, 1996

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*BY FEDERAL EXPRESS*

Ms. Donna M. Caton  
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**Re: Illinois Commerce Commission On Its Own Motion  
Investigation Concerning Illinois Bell Telephone  
Company's Compliance with Section 271(c) of the  
Telecommunications Act of 1996 (Docket No. 96-0404)**

Dear Ms. Caton:

Enclosed for filing in the above-cited docket are an original and four copies of the Rebuttal Testimony of Joseph Gillan on behalf of the Competitive Telecommunications Association ("CompTel"). Please return a date-stamped copy of the enclosed (additional copy provided).

Sincerely,



Linda L. Oliver  
Jeremy B. Miller (Bar No. 6216557)  
Counsel for CompTel

Enclosures

cc: Service List

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RECEIVED  
**Rebuttal Testimony of Joseph Gillan**  
**on behalf of the**  
**Competitive Telecommunications Association**

**Introduction**

1 Q. Please state your name, address and sponsoring organization for the record.

2

3 A. My name is Joseph Gillan. My business address is PO Box 541038, Orlando,  
4 Florida. I previously filed direct testimony in this proceeding on behalf of the  
5 Competitive Telecommunications Association (CompTel).  
6

7 Q. What is the purpose of your rebuttal testimony?

8

9 A. My rebuttal testimony addresses three areas:

10

11 \* To underscore the conclusion of Dr. Shapiro that *commercially*  
12 *meaningful* arrangements must be in place to establish compliance  
13 with the Competitive Checklist.  
14

15 \* To endorse Staff's recommendation that Ameritech's compliance  
16 with Section 252 pricing standards be addressed in Docket 96-  
17 0486.  
18

19 \* To reemphasize that the observed level of local competition in  
20 Illinois effectively "rounds to zero" and, as a result, the  
21 Competitive Presence Test in Section 271 has not been satisfied.

1   **Q.    In a sentence, what do you believe are the core requirements of Section 271?**

2

3   **A.    The core requirements of Section 271 are that Ameritech Illinois has: (1)**  
4           **implemented a list of actions (the Competitive Checklist) predicted to support a**  
5           **multi-vendor competitive local market, and (2) that these actions are shown to be**  
6           **sufficient by the presence of actual competition on a commercial scale (the**  
7           **Competitive Presence Test).**

8

9           The emphasis of my direct testimony was that Ameritech cannot show compliance  
10          with the Competitive Checklist until the Commission completes its review of  
11          Ameritech's Tariffs and Statement -- including establishing prices for network  
12          elements, interconnection, reciprocal compensation, and resale that comply with  
13          the pricing standards of Section 252. Second, the evidence supplied by Ameritech  
14          -- and now confirmed by other parties -- shows that the level of actual entry in the  
15          market proves that the limited tools implemented thus far have not yet reduced  
16          entry barriers to a point where competition is feasible.

**The Competitive Checklist**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

**Q. Do other parties agree that the Competitive Checklist has not yet been satisfied?**

**A. Yes. The testimony of every party echoes the same conclusion as Staff:**

... it is clear that Ameritech Illinois' assertions that it has met all Section 271(c) requirements is premature. 1/

From every vantage point (except Ameritech's), Checklist compliance remains a distant objective. Whether the analysis is comprehensive (such as that provided by AT&T) or focused (such as the discussion in my direct testimony), the conclusion remains the same: Ameritech has not yet implemented the tools required of it by the checklist in a manner that enables meaningful competition.

---

1/ Direct Testimony of Charlotte TerKeurst, ICC Staff Exhibit 1.00, page 7.

1   **Q.    Do you have a recommendation as to how the Commission should approach**  
2       **Checklist compliance in the future?**

3  
4   **A.    Yes. The Commission should make clear to Ameritech that it will judge**  
5       **Checklist compliance by the practical application of these tools in the market. In**  
6       **this regard, I endorse the perspective articulated by Dr. Shapiro:**

7  
8           In economic terms, a key issue in assessing whether a BOC truly is  
9           complying with the competitive checklist is whether the  
10          interconnection terms and conditions offered by the BOC are  
11          sufficient to lower entry barriers and enable genuine local  
12          exchange competition. 2/

13  
14          An endless cycle of legal memoranda alleging paper compliance will not benefit  
15          Illinois consumers; only actual entry and competition will. Ameritech must first  
16          establish the systems and arrangements needed to eliminate barriers to local entry  
17          by making its network practically available to competitors (for instance, the  
18          Illinois Platform arrangement) 3/ at cost-based rates for local competition to take  
19          hold. The Commission should make clear to Ameritech that it will not accept

---

2/    Direct Testimony of Carl Shapiro, page 18.

3/    ICC Consolidated Docket Nos. 95-0458/0531.

1           theoretical compliance in place of measurable competition: the Checklist must be  
2           implemented both in practice and in fact.

3  
4   **Q.   Do other parties share a concern that Checklist compliance must be more**  
5       **than a theoretical finding?**

6  
7   A.   Yes. AT&T witness Puljung provides an informative discussion of the difficulty  
8       of opening the local market and Ameritech's incentives. In particular, the  
9       Commission should note the significant lag between Commission Orders in  
10      Illinois and Michigan and the time that Ameritech actually complies. 4/ Even  
11      more telling, however, is the fact that the Illinois Commission's principal orders  
12      intended to open the market to competition -- the Customers First Order and the  
13      Illinois Platform decision -- have yet to become approved tariffs, much less  
14      operational options that provide entrants meaningful entry vehicles. In the case of  
15      these critical decisions, the "average time to compliance" increases with every  
16      passing day.

---

4/      Mr. Puljung measured this "average time to compliance" as 226 days. AT&T  
Exhibit 1.0, page 30.

1    **Q.    In your opinion, can Ameritech initiate a Track B application by the offering**  
2       **of a Generally Available Statement?**

3  
4    A.    No. My understanding of the effect of Track B is to side-step the Competitive  
5       Presence Test in Section 271, an option included by Congress to address markets  
6       where no carrier showed an interest in entry. Although I am not able to evaluate  
7       the "legal" merits of Ameritech's arguments, I cannot comprehend how a Track B  
8       approach can be consistent with the Act (or the public interest) in Illinois where  
9       the desire of competitors to enter is more clear than perhaps any other state in the  
10      nation.

11  
12   **Q.    Does the Commission have the information necessary to determine network**  
13       **element, interconnection and reciprocal compensation prices that comply**  
14       **with Section 252's pricing standards and thus satisfy the Checklist?**

15  
16   A.    No. I agree with Staff witness Jennings that: 5/

---

5/       Direct Testimony of Jake Jennings, Staff Exhibit 4.00, page 13.

1           The Commission has initiated Docket 96-0486 to address pricing  
2           of interconnection, network elements and reciprocal compensation  
3           based on Section 252(d) of the Act. . . . Therefore, the  
4           Commission should not make a finding, at this time, that  
5           Ameritech Illinois' proposed rates for interconnection, network  
6           elements, and reciprocal compensation as set forth in its General  
7           Statement are consistent with Section 252(d)(1) and (2) of the Act.  
8

9           This recommendation is analogous to the recommendation in my direct testimony  
10          that the Commission determine Ameritech's compliance with Section 252 in the  
11          cited proceeding.

12  
13          I would note that Mr. Jennings' testimony also provides a methodology to  
14          estimate prices that he characterizes as being "consistent with" Section 252. 6/ It  
15          is important, however, that the Commission not confuse "consistency" with  
16          "compliance." Mr. Jennings' shortcut estimation method *may be* useful for  
17          interim prices, but it does not provide the type of analysis necessary to  
18          demonstrate compliance with Section 252. Mr. Jennings' recommendation  
19          recognizes this critical distinction. As a result, there is no need to critique Mr.  
20          Jennings' interim methodology in this proceeding because we both agree that a  
21          thorough review of detailed cost studies in Docket 96-0486 should be the vehicle

---

6/          Direct Testimony of Jake Jennings, ICC Exhibit 4.00, page 11.



1 to establish prices which comply with Section 252 of the Act (and thus satisfy the  
2 Competitive Checklist).

3

4

### The Status of Local Competition

5

6 **Q. Please summarize the testimony relating to the magnitude of current**  
7 **competition.**

8

9 **A.** Staff witness Buecker provides the most comprehensive testimony concerning the  
10 scope of local competition, providing the aggregate number of competitively  
11 provided access lines. 7/ Combined with the statistics provided in my direct  
12 testimony, 8/ the record proves that the state of local competition in Illinois  
13 effectively "rounds to zero."

---

7/ Direct Testimony of Stacy Buecker, Staff Exhibit 2.0, page 7. This statistic may include special access lines which do not provide local services.

8/ Direct Testimony of Joseph Gillan, CompTel Exhibit 1.0, page 25.

1    **Q.    Is there reason to approach Ameritech's claims of local competition**  
2           **skeptically?**

3  
4    A.    Yes. As noted by AT&T witness Puljung, Ameritech has been claiming a  
5           competitive local market for nearly half a decade. 9/ This will continue until the  
6           Commission clearly indicates paper competition is not sufficient for Ameritech to  
7           comply with the Checklist and that only demonstrable competition will suffice.

8  
9    **Q.    Are there any examples of the importance of practical experience?**

10  
11   A.    Yes. Many issues cannot be identified until practical experience with entry  
12           occurs. For instance, Consolidated Communications learned by experience the  
13           practical consequences of Ameritech's charges for power. 10/ The point of this  
14           example is not to emphasize the significance of power-pricing per se, but rather to  
15           illustrate for the Commission that local competition is uncharted territory. And,  
16           like the exploration of any uncharted territory, not all (or even most) issues can be  
17           identified without the benefit of practical experience.

---

9/       Direct Testimony of John Puljung, AT&T Exhibit 1.0, page 5.

10/      Direct Testimony of Scott Jennings, CCI Exhibit 1.0, page 12.

1    **Q.     Is this why the Competitive Presence Test is so important?**

2

3    A.     Yes. If you will excuse the pun, the "competitive presence" test is necessary  
4           because a "competitive prescience" test is not possible: without demonstrated  
5           competition there simply is no basis to judge the adequacy of Ameritech's actions  
6           to open the market.

7

8

#### **Conclusion**

9

10   **Q.     What is your recommendation?**

11

12   A.     My direct testimony recommended that the Commission only determine  
13           Ameritech's checklist compliance after it has concluded its cost and pricing  
14           investigations. The direct testimony of the other parties supports such an  
15           approach. Ameritech may argue that such an approach will delay its interLATA  
16           application, but that is *only* because Ameritech seeks to divorce its interLATA  
17           authority from the prerequisite of local competition and entry.

1       The evidence in this proceeding demonstrates that the level of local competition  
2       in Illinois effectively "rounds to zero." The Commission will not delay  
3       Ameritech's interLATA entry by first establishing viable Checklist tools; it will  
4       only be working to establish the competitive environment that Congress expected  
5       as a predicate to Ameritech's interLATA entry.

6

7   **Q.    Does this conclude your rebuttal testimony?**

8

9   **A.    Yes.**

**CERTIFICATE OF SERVICE**

Jeremy B. Miller, an attorney for the Competitive Telecommunications Association, hereby certifies that on the 21st day of November, 1996, he caused to be served the foregoing Rebuttal Testimony of Joseph Gillan in Docket No. 96-0404 by Federal Express (where indicated) or by U. S. Mail, first class postage prepaid, on the attached service list.

  
\_\_\_\_\_  
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